

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
)	No. 2:19-cr-00013
v.)	
)	Chief Judge Crenshaw
)	
GEORGIANNA A.M. GIAMPIETRO)	

**MOTION TO RENEW GOVERNMENT’S MOTION FOR A PROTECTIVE ORDER
PERTAINING TO THE TESTIMONY OF UNDERCOVER AND ONLINE COVERT
EMPLOYEES AT TRIAL**

The United States of America, by and through its attorneys, the United States Attorney for the Middle District of Tennessee and the Chief of the Counterterrorism Section of the National Security Division, United States Department of Justice, moves to refile the government’s Motion for a Protective Order Pertaining to the Testimony of Undercover and Online Covert Employees at Trial and the Declaration of Jill Sanborn, Assistant Director , Counterterrorism Division, Federal Bureau of Investigation that accompanied that Motion, originally submitted to the Court on June 4, 2020 (D.E. 108, 108-1). In support of this Motion, the government states the following:

1. On January 2, 2020, the Court ordered that all pretrial motions be filed by June 5, 2020, in anticipation of trial of this case commencing on August 17, 2020 (D.E. 89).
2. On June 4, 2020, the government filed its Motion for a Protective Order Pertaining to the Testimony of Undercover and Online Covert Employees, together with the Declaration of Jill Sanborn, Assistant Director, Counterterrorism Division, Federal Bureau of Investigation and a proposed Protective Order (D.E. 108, 108-1, 109). Defendant responded to the Government’s Motion for a Protective Order on June 19,

2020, challenging the protective measures identified by the government for various reasons (D.E. 124).

3. The Court subsequently denied the government's Motion for a Protective Order Pertaining to the Testimony of Undercover and Online Covert Employees without prejudice, explaining that insofar as the trial date had been reset to being on September 14, 2021, the government was free to refile the Motion closer to the new trial date (D.E. 129, 131).
4. On April 16, 2021, the Court scheduled a status conference for June 17, 2021, to address the government's Motion for a Protective Order Pertaining to the Testimony of Undercover and Online Covert Employees, as well as the defendant's response to the Motion.

In anticipation of the upcoming hearing and to ensure that the record in this case clearly reflects the pendency of the government's Motion for a Protective Order in advance of the June 17, 2021, hearing, the government respectfully requests that the Court accept for refiling its original Motion for a Protective Order, the accompanying Declaration of Jill Sanborn and the proposed Protective Order filed in June 2020 (D.E. 108, 108-1, both attached hereto as Exhibit A).

CONCLUSION

The United States respectfully requests this Court grant this motion and the government's motion for a protective order, set forth at in full at Docket Entry 108.

Respectfully Submitted,

MARY JANE STEWART
Acting United States Attorney
Middle District of Tennessee

By: /s/ Kathryn Risinger
KATHRYN RISINGER
Deputy Criminal Chief – Organized Crime

/s/ Phil Wehby
PHIL WEHBY
Assistant United States Attorney
110 9th Avenue South
Nashville, Tennessee 37203
Phone: (615) 736-5151

/s/ Jennifer E. Levy
JENNIFER E. LEVY
Trial Attorney
Counterterrorism Section
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Suite 7600
Washington, D.C. 20530
(202) 514-1092

CERTIFICATE OF SERVICE

I hereby certify that on June 8, 2021, a true and correct copy of the foregoing document was filed electronically via CM/ECF, which will automatically provide service to Charles Swift and Peter Strianse, counsel for the defendant.

/s/ Kathryn Risinger
KATHRYN RISINGER
Deputy Criminal Chief – Organized Crime